

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

NAUTILUS INSURANCE COMPANY,

Plaintiff,

vs.

Richard Alexander Murdaugh, Sr., Cory
Fleming, MOSS & KUHN, P.A., Chad
Westendorf, and PALMETTO STATE BANK,

Defendants.

Civil Action No. 2:22-cv-1307-RMG

**DEFENDANT CORY H. FLEMING'S
REQUEST FOR SPECIAL
VOIR DIRE QUESTIONS**

Under LOCAL CIV. RULE 26.05(O) and 47.04 (D. S. C.), and the “Special Instructions for Cases Before Judge Richard Mark Gergel,” Defendant Cory H. Fleming (“Mr. Fleming”) respectfully request the following special voir dire questions be posed to the prospective jurors:

1. Have you, or any close family member, ever worked in the insurance industry or legal field? If so, please describe.
2. Do you have strong feelings about individuals accused of financial fraud or embezzlement? If so, how might those feelings affect your ability to be impartial?
3. Are you more likely to believe or disbelieve someone accused of fraud if they are also facing or have pled guilty to unrelated criminal charges?
4. This case involves allegations of fraudulent activity and the recovery of funds. Do you feel you can evaluate the evidence presented without bias, based solely on the facts and law?
5. Are you familiar with one of the defendants in this case, Alex Murdaugh or any legal cases involving him? If so, what do you know?
6. Have you followed news coverage about Alex Murdaugh’s criminal trials or allegations

involving fraud, theft, or other misconduct?

7. Have you formed any opinions about Alex Murdaugh or his character based on media reports or other sources? If so, please explain.

8. If selected as a juror, will you be able to set aside any preconceived notions or opinions about Alex Murdaugh or insurance companies and render a fair and impartial verdict?

9. Beginning in January 2023, Alex Murdaugh, went to trial in Colleton County, South Carolina, on charges of two counts of murder and two counts of possession of a weapon during the commission of a violent crime concerning the deaths of his wife Maggie and son Paul. The trial of that case was publicly broadcast and gained national media attention. If any juror watched all or part of that trial or follow the trial in the media, do you believe your experience watching or reading about that trial might make you favor one side or the other in this case?

10. Are you familiar with any allegations of misconduct against a lawyer who represented the estate of Gloria Satterfield? If so, please explain what you know.

11. This case involves a lawyer, Cory Fleming, who has pled guilty to defrauding the Satterfield estate but denies participating in any fraud that led Nautilus Insurance Company to pay settlement proceeds. Would you be able to evaluate Mr. Fleming's actions fairly and impartially, based solely on the evidence presented in this case?

12. Do you believe that a prior guilty plea in a different matter automatically makes someone guilty of related allegations? Please explain how those feelings might affect your ability to be impartial.

13. Do you have any strong feelings, positive or negative, about lawyers accused of professional misconduct? If so, how might those feelings affect your ability to be impartial?

14. Have you ever had any personal or professional dealings with an attorney accused of unethical behavior? If so, please describe and explain how those feelings might affect your ability to be impartial.

Respectfully submitted,

/s/ Thomas A. Pendarvis

Thomas A. Pendarvis (Fed. Id. 5785)

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December 23, 2024

Beaufort, South Carolina